

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

J.A.,

Plaintiff,

v.

RED ROOF INNS, INC., *et. al.*,

Defendants.

Civil Action File No.:

1:21-CV-03655-TWT

DEFENDANT VARAHI HOTEL, LLC'S EXPERT DISCLOSURES

In accordance with the Federal Rules of Civil Procedure, the Local Rules of the Court and the Court's Scheduling Order, Varahi Hotel, LLC hereby designates the following individuals it may use at trial to present evidence under Federal Rules of Evidence 702, 703, or 705:

1. Matthew W. Norman, M.D.
One Riverside
4401 Northside Parkway, NW
Suite 245
Atlanta, GA 30327

Dr. Norman is expected to offer testimony on the issues of causation and damages. Because of the terms of Protective Orders entered in this case and Civil Action Nos. 1:21-04278-WMR and 1:21-CV-03655-TWT, in which he is also being designated as an expert, his report¹ is not being filed with the Court. Said report is being served on Plaintiff's counsel directly. Along with the Report, Varahi is

¹ Dr. Norman's report includes his specific opinions as well as and the basis and reasons for them, the facts or data considered by him in forming his opinions, his qualifications, and a statement of his compensation.

also serving Dr. Norman's CV, which includes his list of publications over the last 10 years, his Rule 26 testimony list, and copies of the interview portions of the IME conducted in this matter.


2. Kimberly Mehlman-Orozco, Ph.D.
Break the Chain LLC
15920 Fairway Drive
Dumfries, Virginia 22025

Dr. Mehlman-Orozco is expected to offer testimony regarding human and sex trafficking, the prevalence of it, and other matters relating to liability in this case. Because of the terms of Protective Orders entered in this case and Civil Action Nos. 1:21-cv-04278-WMR and 1:21-cv-03655-TWT, in which she is also being designated as an expert, Dr. Mehlman-Orozco's report² is not being filed with the Court. Said report is being served on Plaintiff's counsel directly. Included within the Report are Dr. Mehlman-Orozco's CV, her list of publications over the last 10 years and her Rule 26 testimony list.

This 6th day of September 2022.

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Counsel for the Varahi Hotel, LLC

² Dr. Mehlman-Orozco's report includes her specific opinions and the basis and reasons for them, the facts or data considered by her in forming her opinions, her qualifications, and a statement of her compensation

Certificate of Compliance

I hereby certify that the forgoing DEFENDANT VARAHI HOTEL, LLC'S EXPERT DISCLOSURES was prepared using Book Antiqua 13-point font, one of the fonts specified in L.R. 5.1(C).



C. Shane Keith
Georgia Bar No. 411317

Certificate of Service

I hereby certify that on the 6th day of September 2022, I filed the forgoing DEFENDANT VARAHI HOTEL, LLC'S EXPERT DISCLOSURES with the Court by use of its ecf filing system, which will provide a copy of the foregoing to all registered counsel of record in this matter.



C. Shane Keith
Georgia Bar No. 411317